

**Fill in this information to identify the case:**

Debtor 1 Donell Talley

Debtor 2 Tammy Irene Talley  
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PACase number 19-00221 HWV**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of Creditor: M&amp;T Bank

Court claim no. (if known): 18

Last 4 digits of any number you use to identify the debtor's account: 0847

Property address:

5488 Kenwood Avenue  
Harrisburg, PA 17112**Part 2: Prepetition Default Payments**

Check one:

☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_**Part 3: Postpetition Mortgage Payment**

Check one:

☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due:	(a)	\$ <u>1,251.12</u>
b. Total fees, charges, expenses, escrow, and costs outstanding:	+ (b)	\$ <u>0.00</u>
c. <b>Total.</b> Add lines a and b.	(c)	\$ <u>1,251.12</u>

Creditor asserts that the debtor(s) are contractually obligated for 12 / 01 / 2024  
the postpetition payment(s) that first became due on:

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x/s/ Brent J. Lemon

Date 01/13/2025

Brent Lemon  
13 Jan 2025, 10:21:48, EST

KML Law Group, P.C.  
701 Market Street, Suite 5000  
Philadelphia, PA 16106  
215-627-1322  
[bkgroup@kmlawgroup.com](mailto:bkgroup@kmlawgroup.com)  
Attorney for Creditor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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**IN RE: Donell Talley  
Tammy Irene Talley**

**Debtor(s)**

**BK NO. 19-00221 HWV**

**Chapter 13**

**M&T Bank**

**Movant**

**Related to Claim No. 18**

**vs.**

**Donell Talley  
Tammy Irene Talley**

**Debtor(s)**

**Jack N. Zaharopoulos,**

**Trustee**

**CERTIFICATE OF SERVICE  
RESPONSE TO NOTICE OF FINAL CURE MORTGAGE PAYMENT**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on January 14, 2025, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)  
Donell Talley  
5488 Kenwood Avenue  
Harrisburg, PA 17112

Tammy Irene Talley  
5488 Kenwood Avenue  
Harrisburg, PA 17112

Attorney for Debtor(s) (via ECF)  
Kara Katherine Gendron, Esq.  
125 State Street  
Harrisburg, PA 17101

Dorothy L Mott  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101

Trustee (via ECF)  
Jack N. Zaharopoulos  
8125 Adams Drive  
Hummelstown, PA 17036

Method of Service: electronic means or first-class mail.

Dated: January 14, 2025

/s/ Brent J. Lemon  
Brent J. Lemon  
Attorney I.D. 86478  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
(412) 475-8764  
blemon@kmlawgroup.com

Loan Number:  
Mortgagor Last Name:  
Property Address:

Talley  
5488 Kenwood Avenue Harrisburg PA 17112

Filing date: 1/18/2019  
Case#: 19-00221

Date Produced: 1/10/2025

## LPS COMPARISON

TRANSACTION DATE	AMOUNT RECEIVED	CONT. DATE APPLIED TO	CONT. PYMT AMOUNT	CONT. PYMT SHOULD BE	DIFFERENCE OF ESCROW	TO/FROM LPS SUSPENSE	LPS SUSPENSE BALANCE	
1/18/2019	\$570.92	1/1/2019	\$570.92	\$570.92	\$0.00	\$0.00	\$0.00	POC
2/21/2019	\$562.40	<b>2/1/2019</b>	\$562.40	<b>\$562.40</b>	\$0.00	\$0.00	\$0.00	
3/21/2019	\$562.40	3/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
4/3/2019	\$562.40	4/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
5/7/2019	\$562.40	5/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
6/20/2019	\$562.40	6/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
7/15/2019	\$562.40	7/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
8/15/2019	\$562.40	8/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
9/16/2019	\$562.40	9/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
10/18/2019	\$562.40	10/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
11/20/2019	\$562.40	11/1/2019	\$562.40	\$562.40	\$0.00	\$0.00	\$0.00	
12/24/2019	\$626.46	<b>12/1/2019</b>	\$626.46	<b>\$626.46</b>	\$0.00	\$0.00	\$0.00	PCN on file
1/21/2020	\$626.46	1/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
2/19/2020	\$626.46	2/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
3/16/2020	\$626.46	3/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
4/17/2020	\$626.46	4/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
5/18/2020	\$626.46	5/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
7/15/2020	\$626.46	suspense	\$0.00	\$0.00	\$0.00	\$626.46	\$626.46	
7/16/2020	\$626.46	suspense	\$0.00	\$0.00	\$0.00	\$626.46	\$1,252.92	
7/16/2020	\$0.00	6/1/2020	\$626.46	\$626.46	\$0.00	-\$626.46	\$626.46	
7/17/2020	\$0.00	7/1/2020	\$626.46	\$626.46	\$0.00	-\$626.46	\$0.00	
8/14/2020	\$626.46	8/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
9/16/2020	\$626.46	9/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
10/19/2020	\$626.46	10/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
11/16/2020	\$626.46	11/1/2020	\$626.46	\$626.46	\$0.00	\$0.00	\$0.00	
12/17/2020	\$610.78	<b>12/1/2020</b>	\$610.78	<b>\$610.78</b>	\$0.00	\$0.00	\$0.00	PCN on file
1/15/2021	\$610.78	1/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00	
1/22/2021	\$35.79	Trustee	\$0.00	\$0.00	\$0.00	\$35.79	\$35.79	
1/25/2021	\$0.00	pre-pet escrow	\$35.79	\$35.79	\$0.00	-\$35.79	\$0.00	
2/17/2021	\$610.78	2/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00	
2/23/2021	\$44.00	Trustee	\$0.00	\$0.00	\$0.00	\$44.00	\$44.00	

TRANSACTION DATE	AMOUNT RECEIVED	CONT. DATE APPLIED TO	CONT. PYMT AMOUNT	CONT. PYMT SHOULD BE	DIFFERENCE OF ESCROW	TO/FROM LPS SUSPENSE	LPS SUSPENSE BALANCE
2/24/2021	\$0.00	pre-pet escrow	\$44.00	\$44.00	\$0.00	-\$44.00	\$0.00
3/17/2021	\$610.78	3/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
4/22/2021	\$610.78	4/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
5/14/2021	\$610.78	5/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
6/21/2021	\$610.78	6/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
7/16/2021	\$610.78	7/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
8/19/2021	\$68.42	Trustee	\$0.00	\$0.00	\$0.00	\$68.42	\$68.42
8/19/2021	\$610.78	8/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$68.42
8/20/2021	\$0.00	pre-pet escrow	\$5.35	\$5.35	\$0.00	-\$5.35	\$63.07
8/20/2021	\$0.00	Insp fee 1	\$28.00	\$28.00	\$0.00	-\$28.00	\$35.07
8/20/2021	\$0.00	pre-pet LC	\$35.07	\$35.07	\$0.00	-\$35.07	\$0.00
9/17/2021	\$45.44	Trustee	\$0.00	\$0.00	\$0.00	\$45.44	\$45.44
9/20/2021	\$0.00	pre-pet LC	\$45.44	\$45.44	\$0.00	-\$45.44	\$0.00
9/20/2021	\$610.78	9/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
10/18/2021	\$610.78	10/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
10/21/2021	\$45.44	Trustee	\$0.00	\$0.00	\$0.00	\$45.44	\$45.44
10/22/2021	\$0.00	pre-pet LC	\$45.44	\$45.44	\$0.00	-\$45.44	\$0.00
11/17/2021	\$610.78	11/1/2021	\$610.78	\$610.78	\$0.00	\$0.00	\$0.00
11/22/2021	\$44.14	Trustee	\$0.00	\$0.00	\$0.00	\$44.14	\$44.14
11/23/2021	\$0.00	pre-pet LC	\$44.14	\$44.14	\$0.00	-\$44.14	\$0.00
12/16/2021	\$611.80	<b>12/1/2021</b>	\$611.80	<b>\$611.80</b>	\$0.00	\$0.00	\$0.00
12/21/2021	\$44.15	Trustee	\$0.00	\$0.00	\$0.00	\$44.15	\$44.15
12/22/2021	\$0.00	pre-pet LC	\$44.15	\$44.15	\$0.00	-\$44.15	\$0.00
1/21/2022	\$611.80	1/1/2022	\$611.80	\$611.80	\$0.00	\$0.00	\$0.00
1/26/2022	\$44.13	Trustee	\$0.00	\$0.00	\$0.00	\$44.13	\$44.13
1/27/2022	\$0.00	pre-pet LC	\$44.13	\$44.13	\$0.00	-\$44.13	\$0.00
2/22/2022	\$611.80	2/1/2022	\$611.80	\$611.80	\$0.00	\$0.00	\$0.00
2/28/2022	\$44.14	Trustee	\$0.00	\$0.00	\$0.00	\$44.14	\$44.14
3/1/2022	\$0.00	pre-pet LC	\$44.14	\$44.14	\$0.00	-\$44.14	\$0.00
3/16/2022	\$611.80	3/1/2022	\$611.80	\$611.80	\$0.00	\$0.00	\$0.00
3/21/2022	\$36.09	Trustee	\$0.00	\$0.00	\$0.00	\$36.09	\$36.09
3/22/2022	\$0.00	pre-pet LC	\$36.09	\$36.09	\$0.00	-\$36.09	\$0.00
4/19/2022	\$611.80	4/1/2022	\$611.80	\$611.80	\$0.00	\$0.00	\$0.00
5/19/2022	\$611.80	5/1/2022	\$611.80	\$611.80	\$0.00	\$0.00	\$0.00
7/8/2022	\$611.80	suspense	\$0.00	\$0.00	\$0.00	\$611.80	\$611.80
7/11/2022	\$0.00	6/1/2022	\$611.80	\$611.80	\$0.00	-\$611.80	\$0.00
8/12/2022	\$611.80	suspense	\$0.00	\$0.00	\$0.00	\$611.80	\$611.80
8/15/2022	\$0.00	7/1/2022	\$611.80	\$611.80	\$0.00	-\$611.80	\$0.00

PCN on file

TRANSACTION DATE	AMOUNT RECEIVED	CONT. DATE APPLIED TO	CONT. PYMT AMOUNT	CONT. PYMT SHOULD BE	DIFFERENCE OF ESCROW	TO/FROM LPS SUSPENSE	LPS SUSPENSE BALANCE
9/26/2022	\$611.80	suspense	\$0.00	\$0.00	\$0.00	\$611.80	\$611.80
9/27/2022	\$0.00	8/1/2022	\$611.80	\$611.80	\$0.00	-\$611.80	\$0.00
10/18/2022	\$1,223.60	suspense	\$0.00	\$0.00	\$0.00	\$1,223.60	\$1,223.60
10/19/2022	\$0.00	9/1/2022	\$611.80	\$611.80	\$0.00	-\$611.80	\$611.80
10/19/2022	\$0.00	10/1/2022	\$611.80	\$611.80	\$0.00	-\$611.80	\$0.00
11/21/2022	\$611.80	11/1/2022	\$611.80	\$611.80	\$0.00	\$0.00	\$0.00
1/17/2023	\$619.38	suspense	\$0.00	\$0.00	\$0.00	\$619.38	\$619.38
1/18/2023	\$0.00	<b>12/1/2022</b>	\$619.38	<b>\$619.38</b>	\$0.00	-\$619.38	\$0.00
1/20/2023	\$619.38	1/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
2/21/2023	\$619.38	2/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
3/20/2023	\$619.38	3/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
4/14/2023	\$619.38	4/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
6/2/2023	\$619.38	suspense	\$0.00	\$0.00	\$0.00	\$619.38	\$619.38
6/5/2023	\$0.00	5/1/2023	\$619.38	\$619.38	\$0.00	-\$619.38	\$0.00
6/15/2023	\$619.38	6/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
7/31/2023	\$619.38	7/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
9/22/2023	\$1,238.76	suspense	\$0.00	\$0.00	\$0.00	\$1,238.76	\$1,238.76
9/25/2023	\$0.00	8/1/2023	\$619.38	\$619.38	\$0.00	-\$619.38	\$619.38
9/25/2023	\$0.00	9/1/2023	\$619.38	\$619.38	\$0.00	-\$619.38	\$0.00
10/19/2023	\$619.38	10/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
12/4/2023	\$619.38	11/1/2023	\$619.38	\$619.38	\$0.00	\$0.00	\$0.00
1/29/2024	\$625.24	suspense	\$0.00	\$0.00	\$0.00	\$625.24	\$625.24
1/30/2024	\$0.00	<b>12/1/2023</b>	\$625.24	<b>\$625.24</b>	\$0.00	-\$625.24	\$0.00
2/1/2024	\$625.24	1/1/2024	\$625.24	\$625.24	\$0.00	\$0.00	\$0.00
2/22/2024	\$625.24	2/1/2024	\$625.24	\$625.24	\$0.00	\$0.00	\$0.00
3/4/2024	\$625.24	3/1/2024	\$625.24	\$625.24	\$0.00	\$0.00	\$0.00
5/6/2024	\$625.24	suspense	\$0.00	\$0.00	\$0.00	\$625.24	\$625.24
5/7/2024	\$0.00	4/1/2024	\$625.24	\$625.24	\$0.00	-\$625.24	\$0.00
5/30/2024	\$625.24	5/1/2024	\$625.24	\$625.24	\$0.00	\$0.00	\$0.00
8/8/2024	\$625.24	suspense	\$0.00	\$0.00	\$0.00	\$625.24	\$625.24
8/9/2024	\$0.00	6/1/2024	\$625.24	\$625.24	\$0.00	-\$625.24	\$0.00
9/23/2024	\$625.24	suspense	\$0.00	\$0.00	\$0.00	\$625.24	\$625.24
9/24/2024	\$625.24	suspense	\$0.00	\$0.00	\$0.00	\$625.24	\$1,250.48
9/24/2024	\$0.00	7/1/2024	\$625.24	\$625.24	\$0.00	-\$625.24	\$625.24
9/25/2024	\$0.00	8/1/2024	\$625.24	\$625.24	\$0.00	-\$625.24	\$0.00
9/27/2024	\$625.24	9/1/2024	\$625.24	\$625.24	\$0.00	\$0.00	\$0.00
11/15/2024	\$625.24	suspense	\$0.00	\$0.00	\$0.00	\$625.24	\$625.24
11/19/2024	\$0.00	10/1/2024	\$625.24	\$625.24	\$0.00	-\$625.24	\$0.00

PCN on file

PCN on file

[illegible]

TRANSACTION DATE	AMOUNT RECEIVED	CONT. DATE APPLIED TO	CONT. PYMT AMOUNT	CONT. PYMT SHOULD BE	DIFFERENCE OF ESCROW	TO/FROM LPS SUSPENSE	LPS SUSPENSE BALANCE
					\$0.00	\$0.00	-\$1,251.12

\$0.00